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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 VONDA WHITE,) Case No. CV 07-02624 JSL (FMO)
11 Petitioner,) **STIPULATED**
12 v.) **PROTECTIVE ORDER**
13 DAWN DAVISON, Warden,)
14 California Institution for Women,)
15 Corona, California,)
16 Respondent.)

17 It is hereby stipulated by the parties to this action, through their attorneys of
18 record, as follows:

19 1. The parties hereby agree and stipulate that the provisions of this
20 protective order shall apply to all documents and information within the produced
21 documents and other relevant information ordered disclosed by Magistrate Judge
22 Fernando M. Olguin in his Order dated December 10, 2007.

23 2. All such documents and information referenced in paragraph No. 1 above
24 which are produced in this action by Respondent's counsel shall be subject to this
25 protective order.

26 3. The documents and information referenced in paragraph Nos. 1 and 2
27 above may be disclosed only to the following persons:

28 a. Counsel of record for Petitioner in this action;

1 b. Attorney, paralegal, stenographic, clerical, and secretarial
2 personnel employed by counsel of record for the Petitioner;

3 c. Court personnel and stenographic reporters engaged in such
4 proceedings as are incidental to the preparation of any hearings or proceedings in
5 this action;

6 d. Any outside expert or consultant retained by Petitioner's counsel
7 for purposes of this action.

8 4. Information regarding a specific inmate, former inmate, parolee or former
9 parolee contained in any document shall not be disclosed to, or discussed with, any
10 other inmate, former inmate, parolee or former parolee, unless a written waiver
11 expressly authorizing such disclosure has been obtained from the specified inmate
12 or parolee prior to disclosure and such disclosure is necessary to the preparation of
13 this action. Such waiver from the inmate, former inmate, parolee or former parolee
14 to whom the records pertain shall expressly authorize the disclosure of records
15 from her parole hearing transcript.

16 5. Each person to whom disclosure of the documents and information
17 described in paragraph Nos. 1 and 2 above is made shall, prior to the time of
18 disclosure, be provided by the person furnishing such confidential material a copy
19 of this order, and shall agree in writing that he or she has read this protective order
20 and understand and agree to be bound by its provisions. Such persons must also
21 consent to be subject to the jurisdiction of the United States District Court for the
22 Central District of California with respect to any proceeding relating to
23 enforcement of this order, including, without limitation, any proceeding for
24 contempt. The person making the disclosure shall retain the original executed
25 written agreement until termination of this litigation, or until otherwise ordered by
26 the Court. A copy of each such agreement will be furnished to counsel for
27 Respondent upon order of the Court.

1 6. At the conclusion of this action and any appeal, or upon other termination
2 of this litigation, all documents described in paragraph Nos. 1-2 above obtained by
3 counsel for Petitioner and all copies of such material, in possession of counsel for
4 Petitioner shall, upon request by Respondent's counsel, be returned to counsel for
5 Respondent within thirty days.

6 7. All documents and information obtained by counsel for Petitioner shall
7 be used solely in connection with this litigation, or a related appellate proceeding,
8 and not for any other purpose, including any other litigation.

9 8. Attorneys for Petitioner and their legal assistants and consultants shall
10 not make copies of any of the documents provided to them except as necessary for
11 purposes of this litigation. Counsel for Petitioner shall maintain a record of all
12 persons to whom he has afforded access to said documents.

13 9. Each person who has been afforded access to said documents and
14 information shall not disclose or discuss the documents or information with any
15 person except as is necessary to this case, and then only in accordance with
16 paragraph Nos. 3 and 4 of this order.

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2 10. The provisions of this order shall remain in force and effect until further
3 order of this Court.

4 **IT IS SO STIPULATED.**

5 Dated: January 15, 2008

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7 /s/ Michael R. Marrinan

8 Attorney for Petitioner

9 E-mail: mrmarrian@aol.com

10 Dated: January 15, 2008

11 /s/ Lora Fox Martin

12 Deputy Attorney General

13 Attorney for Respondent

14 E-mail: Lora.Martin@doj.ca.gov

15 **ORDER**

16 **PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.**

17 Dated: 1/17/08

18 /s/
19 Fernando M. Olguin
20 United States Magistrate Judge
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